

THE TRUITT LAW FIRM
A Limited Liability Company
149 NORTH NEW HAMPSHIRE STREET
COVINGTON, LA 70433
EIN 72-1314501
(985) 327-5266

September 10, 2013

Invoice submitted to:
DOUGLAS HANDSHOE
POST OFFICE BOX 788
WIGGINS, MS 39577

In Reference To: SLABBED NEW MEDIA, LLC, A MISSISSIPPI LLC, DOUGLAS
HANDSHOE v. TROUT POINT LODGE, LIMITED, A FOREIGN
LIMITED COMPANY; CHARLES LEARY AND VAUGHN PERRET

Invoice #38068

Professional Services

			<u>Hours</u>	<u>Amount</u>
3/2/2012	JET	Appear for/attend meeting with client re: initial meeting to discuss case	2.00	500.00
3/8/2012	JET	Review/analyze new file and various pleadings filed	1.00	250.00
	JET	Communicate with client re: status of case	1.00	250.00
3/21/2012	JET	Communicate with client re: status of case	0.50	125.00
	JET	Research re: SPEECH Act	2.20	550.00
	JET	Communicate with client re: status of case	0.90	225.00
	JET	Draft/revise letter/email to client re: pleadings to be filed	0.50	125.00
	JET	Review/analyze Removal Petition and related pleadings	0.90	225.00
	JET	Review/analyze letter/email of client re: pleadings	0.20	50.00
4/2/2012	JET	Communicate with other counsel re: status of case, filing of foreign judgment and removal	0.80	200.00
4/6/2012	JET	Research re: consolidation of both Federal Court actions	1.40	350.00
	JET	Communicate with client re: status of case	0.90	225.00



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4/6/2012	JET	Review/analyze Order of court and various pleadings	0.50	125.00
4/11/2012	JET	Plan and prepare for preparation of Position Paper per Order of court	1.90	475.00
	JET	Communicate with client re: Position Paper and status of case	0.40	100.00
4/12/2012	JET	Communicate with client re: status of case	0.20	50.00
	JET	Draft/revise rough draft of Position Paper per Order of court	3.10	775.00
4/13/2012	JET	Research re: position paper for Magistrate per Order of court	2.50	625.00
	JET	Draft/revise Position Paper for Magistrate Roper per Order of court	2.60	650.00
	JET	Draft/revise letter/email to client re: Position Paper	0.20	50.00
	JET	Review/analyze letter/email of client re: Position Paper	0.20	50.00
4/18/2012	JET	Appearance for/attend meeting with client in New Orleans, Louisiana (including travel time)	3.50	875.00
4/24/2012	JET	Appearance for/attend telephone pre-trial conference with Court and plaintiff's counsel	0.50	125.00
	JET	Review/analyze Order of court	0.30	75.00
	JET	Communicate with client re: status of case, pre-trial conference, and Motion for Summary Judgment	0.50	125.00
5/2/2012	JET	Communicate with Nova Scotia court re: transcript production	0.20	50.00
	JET	Draft/revise letter/email to defendant's counsel re: production of transcript	0.10	25.00
	JET	Communicate with client re: status of case	0.30	75.00
5/3/2012	JET	Review/analyze letter/email of plaintiff's counsel re: transcript	0.10	25.00
	JET	Review/analyze additional letter/email of plaintiff's counsel re: transcript	0.10	25.00
5/4/2012	JET	Review/analyze letter/email from Nova Scotia court	0.10	25.00

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5/4/2012	JET	Draft/revise letter/email to plaintiff's counsel re: transcript request	0.10	25.00
5/9/2012	JET	Review/analyze Scheduling Order of court	0.80	200.00
	JET	Draft/revise letter/email to defendant's counsel re: transcripts and status of case	0.20	50.00
	JET	Draft/revise letter/email to client: re: Order of court	0.20	50.00
	JET	Review/analyze letter/email of client: re: Order of court	0.20	50.00
5/16/2012	JET	Communicate with other counsel re: status of case	0.30	75.00
	JET	Draft/revise letter/email to plaintiff's counsel re: briefing	0.10	25.00
5/18/2012	JET	Review/analyze letter/email of client re: status of case	0.20	50.00
	JET	Draft/revise letter/email to client re: status of case	0.10	25.00
5/22/2012	JET	Research re: SPEECH Act and Mississippi defamation law	3.20	800.00
5/23/2012	JET	Draft/revise letter/email to client re: article in support of Motion for Summary Judgment	0.10	25.00
	JET	Review/analyze letter/email of client re: status of case and article in support of Motion for Summary Judgment	0.10	25.00
	JET	Research re: review of Slabbed blog	2.30	575.00
	JET	Communicate with client re: article in support of Motion for Summary Judgment	0.50	125.00
5/24/2012	JET	Research re: burden of proof in defamation case, summary judgment case law and public figures	6.00	1,500.00
5/25/2012	JET	Research re: damages in defamation action, injunction and prior restraint, actual malice and First Amendment and derogatory speech, hate speech and anti-gay speech	5.00	1,250.00
5/29/2012	JET	Research re: First Amendment and internet, bloggers, fighting words and personal jurisdiction	4.50	1,125.00

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5/30/2012	JET	Research re: Canadian personal jurisdiction and comity, basic personal jurisdiction law, general jurisdiction, personal jurisdiction for bloggers and Internet and minimum contacts inquiry	6.00	1,500.00
	JET	Appear for/attend meeting with client re: status of case and research developments	1.50	375.00
6/1/2012	JET	Research re: damages for US defamation	3.00	750.00
6/4/2012	JET	Research re: defamatory speech, homosexuality and Canadian defamation law	8.00	2,000.00
	JET	Communicate with client re: status of case	0.50	125.00
6/5/2012	JET	Research re: Canadian defamation law (continued)	3.00	750.00
6/12/2012	JET	Research re: law review articles discussing SPEECH Act	2.00	500.00
	JET	Draft/revise draft of Motion for Summary Judgment and Memorandum in Support of Motion for Summary Judgment	1.60	400.00
	JET	Draft/revise letter/email to client re: draft of Motion for Summary Judgment	0.10	25.00
	JET	Draft/revise Motion for Summary Judgment and Memorandum in Support of Motion for Summary Judgment of Defendants	7.20	1,800.00
	JET	Communicate with client re: Motion for Summary Judgment	0.40	100.00
	JET	Review/analyze letter/email of client re: draft of Motion for Summary Judgment	0.10	25.00
6/13/2012	JET	Draft/revise Motion for Summary Judgment and Memorandum in Support of Motion for Summary Judgment of Defendants (continued)	5.20	1,300.00
6/14/2012	JET	Draft/revise Motion for Summary Judgment and Affidavit (continued)	6.90	1,725.00
6/18/2012	JET	Communicate with other counsel re: motions filing deadline	0.30	75.00
6/19/2012	JET	Review/analyze letter/email of plaintiff's counsel re: status of case and filing of Motions for Summary Judgment	0.20	50.00

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6/19/2012	JET	Communicate with other counsel re: Motion for Summary Judgment and status of case	0.40	100.00
	JET	Appear for/attend meeting with client re: status of case, review additional documents received from plaintiff's counsel (over 1,000 pages), and Motion for Summary Judgment	1.60	400.00
	JET	Draft/revise Motion for Summary Judgment, Affidavit, and Memorandum in Support of Motion for Summary Judgment (final version)	5.10	1,275.00
6/20/2012	JET	Review/analyze plaintiffs' Motion for Summary Judgment, Memorandum in Support of Motion for Summary Judgment, and voluminous exhibits	2.20	550.00
	JET	Draft/revise letter/email to client re: status of case and Motion for Summary Judgment	0.20	50.00
	JET	Research re: case law cited by plaintiffs in Motion for Summary Judgment	2.50	625.00
	JET	Review/analyze letter/email of client re: status of case and Motion for Summary Judgment	0.20	50.00
6/21/2012	JET	Communicate with client re: plaintiffs' Motion for Summary Judgment and status of case	0.50	125.00
6/26/2012	JET	Appearance for/attend meeting with client to sign Affidavit and review pleadings filed	2.20	550.00
6/28/2012	JET	Draft/revise initial version of Memorandum in Opposition to Motion for Summary Judgment	1.50	375.00
	JET	Communicate with Clerk of Court re: error messages from Clerk and correct procedures for filing	0.30	75.00
6/29/2012	JET	Review/analyze letter/email of plaintiff's counsel re: extension of time on Memorandum in Opposition to Motion for Summary Judgment	0.10	25.00
	JET	Draft/revise letter/email to plaintiff's counsel re: extension of time on Memorandum in Opposition to Motion for Summary Judgment	0.10	25.00
	JET	Draft/revise final version of Memorandum in Opposition to plaintiff's Motion for Summary Judgment	3.90	975.00

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6/29/2012	JET	Draft/revise letter/email to client re: Memorandum in Opposition to Motion for Summary Judgment	0.10	25.00
	JET	Review/analyze letter/email of client re: Memorandum in Opposition to Motion for Summary Judgment	0.10	25.00
7/16/2012	JET	Review/analyze plaintiffs' Memorandum in Opposition to Motion for Summary Judgment	2.00	500.00
7/18/2012	JET	Research re: Memorandum in Opposition to Motion for Summary Judgment in order to draft Reply Memorandum	2.80	700.00
7/19/2012	JET	Draft/revise Reply Memorandum	3.50	875.00
	JET	Draft/revise letter/email to client re: exhibits to Reply Memorandum	0.30	75.00
	JET	Review/analyze letter/email of client re: exhibits to Reply Memorandum	0.20	50.00
7/21/2012	JET	Draft/revise final version of Reply Memorandum	2.90	725.00
7/27/2012	JET	Communicate with client re: status of case and possible response to plaintiffs' Motion for Summary Judgment	0.50	125.00
	JET	Communicate with other counsel re: Motion to Strike	0.20	50.00
	JET	Review/analyze plaintiffs' Motion to Strike	0.30	75.00
8/2/2012	JET	Review/analyze various emails from plaintiff's counsel	0.30	75.00
	JET	Communicate with other counsel re: status of case	0.50	125.00
	JET	Appearance for/attend meeting with client in New Orleans, Louisiana (including travel time)	2.80	700.00
8/3/2012	JET	Draft/revise Supplemental Memorandum in Support of Motion for Summary Judgment and related research	2.20	550.00
	JET	Review/analyze Motion for Leave to File Memorandum in Support of Motion for Summary Judgment	0.50	125.00
8/7/2012	JET	Review/analyze Motion to Withdraw Motion to Strike	0.20	50.00

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8/7/2012	JET	Communicate with other counsel and Court re: briefing issues	0.40	100.00
8/21/2012	JET	Review/analyze plaintiff's Final Reply Memorandum in Support of Motion for Summary Judgment and related Affidavits	2.20	550.00
	JET	Draft/revise letter/email to client re: latest filings of plaintiffs	0.20	50.00
	JET	Review/analyze letter/email of client re: latest filings of plaintiffs	0.10	25.00
9/10/2012	JET	Review/analyze Emergency Motion to Expedite filed by plaintiffs	0.60	150.00
	JET	Communicate with client re: status of case and filing of motions	0.50	125.00
9/14/2012	JET	Review/analyze new Order of court re: pre-trial conference	0.10	25.00
10/9/2012	JET	Communicate with client re: status of case and recent developments	0.50	125.00
10/15/2012	JET	Appearance for/attend meeting with client re: developments	0.70	175.00
10/30/2012	JET	Communicate with Judge's chambers re: status of case	0.20	50.00
10/31/2012	JET	Draft/revise letter/email to plaintiff's counsel re: status of case	0.10	25.00
	JET	Communicate with client re: status of case and status of Motions for Summary Judgment	0.50	125.00
11/5/2012	JET	Communicate with client re: status of case and settlement discussions	0.30	75.00
	JET	Draft/revise letter/email to plaintiff's counsel re: amicable resolution	0.10	25.00
11/8/2012	JET	Draft/revise Settlement Conference Position Paper per Order of court	2.50	625.00
	JET	Communicate with client re: status of case and mediation conference	0.40	100.00
11/12/2012	JET	Draft/revise letter/email to Magistrate Roper re: status of case	0.20	50.00
	JET	Communicate with client re: pre-trial conference and status of case	0.30	75.00
11/15/2012	JET	Appearance for/attend settlement conference in Gulfport, MS with Magistrate Roper (including travel time to and from) and pre-meeting with client	5.50	1,375.00

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11/16/2012	JET	Review/analyze Order of court	0.10	25.00
12/3/2012	JET	Communicate with client re: status of case and new lawsuit filed	0.50	125.00
12/18/2012	JET	Review/analyze Court's Reasons for Judgment	1.00	250.00
	JET	Draft/revise letter/email to client re: status of case and Reasons for Judgment	0.20	50.00
	JET	Communicate with client re: Reasons for Judgment and status of case	0.50	125.00
	JET	Review/analyze letter/email of client re: status of case and Reasons for Judgment	0.20	50.00
12/27/2012	JET	Review/analyze Notice of Appeal	0.20	50.00
	JET	Communicate with client re: appeal	0.50	125.00
	JET	Research re: appeal bond	0.60	150.00
	JET	Draft/revise Motion for Appeal Bond	1.10	275.00
	JET	Draft/revise letter/email to Judge Guirola re: appeal bond	0.20	50.00
12/28/2012	JET	Draft/revise letter/email to client re: appeal	0.10	25.00
	JET	Review/analyze letter/email of client re: appeal	0.20	50.00
1/8/2013	JET	Review/analyze letter/email from plaintiff's counsel re: status of case and Motion and Order for Extension of Time	0.20	50.00
	JET	Draft/revise Objection to Motion and Order for Extension of Time	0.40	100.00
	JET	Draft/revise letter/email to plaintiff's counsel re: Motion and Order for Extension of Time	0.10	25.00
	JET	Communicate with client re: status of case and Motion and Order for Extension of Time	0.50	125.00
1/11/2013	JET	Communicate with client re: appeal and status of case	0.50	125.00

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1/12/2013	JET	Review/analyze Orders of court	0.30	75.00
	JET	Draft/revise Notice of Appearance in US Fifth Circuit	0.30	75.00
1/25/2013	NNB	Review/analyze Memorandum in Opposition to Motion for Bond	0.50	125.00
	NNB	Research re: diversity of judgment and cost	1.40	350.00
	NNB	Draft/revise Reply to Response for Appeal Bond	5.30	1,325.00
2/6/2013	JET	Communicate with client re: appeal and status of case	0.30	75.00
2/13/2013	PSC	Communicate in firm re: appellate court rules - statement of issues	0.30	75.00
	PSC	Research re: Federal Rule of Appellate Procedure - timeframe for submission of appellee in response to appellant's Statement of Issues filed	0.30	75.00
	PSC	Review/analyze Statement of Issues on behalf of appellant; analyze necessity of requesting additional parts of transcript	0.20	50.00
	PSC	Communicate in firm re: necessity of requesting additional parts of transcript; FRAP 10	0.30	75.00
2/25/2013	HL	Research re: certified copies of documents filed electronically	0.30	22.50
	HL	Draft/revise correspondence to USDC-So. District of Mississippi re: certified copies of Judgment and Reasons	0.30	22.50
3/20/2013	JET	Review/analyze Appellant's Brief	2.70	675.00
3/22/2013	BLM	Draft/revise Appellee Brief re: formatting, Table of Contents, Citations, Certifications, etc.	2.20	275.00
	JET	Research re: all cases cited by appellants and update case law	3.90	975.00
3/29/2013	JET	Draft/revise Appellee's Brief	8.20	2,050.00
4/11/2013	JET	Review/analyze Reply Brief of plaintiffs	1.50	375.00
	JET	Communicate with client re: Reply Brief of plaintiffs	0.40	100.00

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4/30/2013	JET	Review/analyze letter/email of plaintiff's counsel re: Motion for Reconsideration	0.20	50.00
	JET	Draft/revise letter/email to plaintiff's counsel re: Objections to Motion	0.10	25.00
	JET	Review/analyze plaintiff's Motion for Reconsideration	0.20	50.00
	JET	Communicate with other counsel re: Motion for Reconsideration	0.20	50.00
6/20/2013	JET	Communicate with Court of Appeals re: argument on case	0.30	75.00
7/17/2013	JET	Communicate with client re: oral argument on appeal	0.40	100.00
7/19/2013	JET	Appearance for/attend meeting with client re: oral argument on appeal	1.30	325.00
8/5/2013	JET	Plan and prepare for oral argument in the Court of Appeal, research re: update on case law, and review of briefs	5.60	1,400.00
	JET	Other (travel to and from Houston, Texas for oral argument, including non-billable down time due to travel arrangements)	12.30	3,075.00
	JET	Appearance for/attend meeting with client to discuss status of case and appeal	2.20	550.00
8/6/2013	JET	Appearance for/attend oral argument in Court of Appeal in Houston, Texas	3.30	825.00
8/7/2013	JET	Draft/revise letter/email to client re: status of case	0.30	75.00
	JET	Draft/revise letter/email to plaintiff's counsel re: status of case and appeal	0.10	25.00
	JET	Review/analyze decision of U.S. Fifth Circuit	2.00	500.00
	JET	Communicate with client re: decision of U.S. Fifth Circuit	1.10	275.00
	JET	Draft/revise letter/email to client re: status of case	0.20	50.00
	JET	Review/analyze letter/email of client re: status of case	0.20	50.00
9/5/2013	JET	Research re: attorney's fees	1.10	275.00
For professional services rendered			<u>222.00</u>	<u>\$55,120.00</u>

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Balance due

Amount

\$55,120.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
BARBARA MANTON - PARALEGAL	2.20	125.00	\$275.00
HEATHER LOSCH - PARALEGAL	0.60	75.00	\$45.00
JACK E. (BOBBY) TRUITT - PARTNER	210.90	250.00	\$52,725.00
NANCY BUTCHER - ASSOCIATE	7.20	250.00	\$1,800.00
PAMELA S. CHEHARDY - ASSOCIATE	1.10	250.00	\$275.00

WE SINCERELY APPRECIATE YOUR PROMPT PAYMENT.